

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

Plaintiffs,

v.

Gregory W. Abbott, *et al.*,

Defendants.

No. 5:21-cv-00844-XR

INTERVENOR-DEFENDANTS' RULE 26(a)(3) DISCLOSURES

Pursuant to Rule 26(a)(3), Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (collectively, the “Intervenor-Defendants”), hereby respond as follows:

(i) The name and, if not previously provided, the address and telephone number of each witness separately identifying those whom the party expects to present and those it may call if the need arises.

RESPONSE:

Intervenor-Defendants reserve the right to call any witnesses or potential witnesses disclosed by any other party in this case. Intervenor-Defendants also reserve the right to call any person as a rebuttal witness or witness for impeachment purposes.

(ii) The designation of those witnesses whose testimony is expected to be presented by means of a deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition.

RESPONSE:

Intervenor-Defendants intend to introduce the designated portions of the deposition transcript testimony of the following witnesses:

1. Alan Vera (Deposition date Feb. 27, 2023): 19:6-11; 25:1-14; 26:13-25; 34:4-24; 35:12-18; 40:11-16; 50:17(starting with “Is”)-20; 53:7-55:2; 56:5-58:3; 58:14-18; 58:24-25; 68:13-21; 71:10-72:11; 72:17(starting with “Did”)-24; 73:10-74:13; 84:15-25; 85:5-15; 85:22-86:2; 86:5 (starting with “Do”)-89:19; 90:3-93:10; 93:25 (starting with “So”)-94:11; 105:21-106:9; 106:22-112:12; 119:24-120:12; 121:2-7; 121:22-25; 143:18-144:2; 157:1-158:11; 158:15-159:12; 160:1-161:6; 162:11-16.

2. Cynthia Siegel (Deposition date Feb. 28, 2023): 10:19-11:7; 16:22-17:1; 26:22-28:9; 33:17-34:6; 35:1-24; 36:11-37:9; 55:25-56:18; 57:4-58:11; 62:15-63:11; 91:6-95:15; 97:4-13; 99:23-100:9; 103:1 (starting with “I”)-9.

3. Susan Fountain (Deposition date Apr. 26, 2023): 15:11-14; 27:15-17; 69:17-70:8; 72:11-73:4; 73:17-75:24; 93:1-8; 93:19-94:6; 94:17(starting with “Who”)-23; 96:5-11; 96:20-97:10; 97:24-98:6; 101:10-17; 107:16-20; 112:23-113:2; 114:3-15; 117:9-23; 118:5-21; 122:4-22; 123:13-124:2; 160:2-161:8.

(iii) An identification of each document or other exhibit, including summaries of other evidence—separately identifying those which the party expects to offer and those it may offer if the need arises.

RESPONSE:

Intervenor-Defendants intend to offer into evidence the following exhibits:

1. Intervenor-Defendants' Second Supplemental Responses And Objections To Plaintiffs' First Set Of Interrogatories (Apr. 28, 2023)
2. August 9, 2021 Email from C. Siegel to Senators, RPCI_0000331-332
3. Harris County Republican Party 2021 Election Integrity Resolution, RPCI__0002328-329
4. May 5, 2022 Email from M. Scarpello, RPCI_0000361-3666

Intervenor-Defendants may offer into evidence any written responses served by any other party in this action pursuant to Rules 33, 34, or 36 of the Federal Rules of Civil Procedure.

Intervenor-Defendants reserve the right to use any document or exhibit identified by any other parties in this action and to use any document for impeachment or rebuttal purposes.

Intervenor-Defendants reserve the right to amend or correct these pretrial disclosures, if necessary.

July 28, 2023

Respectfully submitted,

/s/ John M. Gore

John M. Gore

E. Stewart Crosland (*pro hac vice*)

Louis J. Capozzi III (*pro hac vice*)

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3939

Fax: (202) 626-1700

jmgore@jonesday.com

scrosland@jonesday.com

lcapozzi@jonesday.com

Counsel for Intervenor-Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record.

/s/ John M. Gore